

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**VIRNETX INC., and
LEIDOS, INC.,**

Plaintiffs,

v.

APPLE INC.,

Defendant.

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No. 6:12-cv-00855-RWS

JURY TRIAL DEMANDED

STIPULATED ORDER ON EXECUTION OF JUDGMENT AGAINST APPLE INC.

The parties have agreed as follows:

A. Apple will not be required to post bond or other security pending appeal. Plaintiffs have agreed to accept the verification of Exhibit A to this Stipulated Order as sufficient evidence of Apple's present ability to satisfy the Judgment in this matter entered on August 30, 2018 ("Judgment in this matter" or "Judgment").

B. Apple further agrees (i) to provide updated verifications, in the form of Exhibit B hereto, to Plaintiffs on a quarterly basis, confirming Apple's continuing ability to satisfy the Judgment in this matter and (ii) to report to Plaintiffs, in the form of Exhibit C hereto, within seven days of the Company's determination that its ability to satisfy the Judgment in this matter is compromised.

C. Apple agrees that, as provided in Exhibit A, Apple will pay any payments then due under the Judgment within 20 days of completion of any appeal from the Judgment in this matter, as well as any proceedings seeking relief from the Judgment before the Supreme Court of the United States, and any remand proceedings in the event the court of appeals or Supreme Court

grants Apple relief from the Judgment, or within 20 days of the expiration of the times for initiating such appellate or Supreme Court proceedings.

D. In reliance on the certification of Exhibit A and Apple's obligations in paragraphs B and C immediately above, Plaintiffs agree that they will not execute before 20 days after the completion of proceedings as provided in paragraph C.

E. Any party can move the Court for modification, failing agreement between the parties on such modification, under any circumstances which that party deems sufficient to justify modification.

Signed and agreed as to form and content:

DATED: September 12, 2018

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